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December 29, 2024

VIA ECF

Honorable Alvin K. Hellerstein, United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1050
New York, NY 10007-1312

Re: *United States of America v. Martin Silver*, S1 20 Cr. 360 (AKH)

Dear Judge Hellerstein:

Attached please find a proposed order lifting the retraining notices on the accounts that were subject to the government's turnover motion in the above-captioned case (the "Subject Accounts").

Per the Court's December 19, 2024 order, after receiving a draft order from the government on December 20, we attempted to confer with the government about its content on December 22, 23, 26, and 28, but received no substantive response. Because Mr. Silver would like to make his first restitution payment from the Subject Accounts on or before December 31, we respectfully request that the Court endorse Mr. Silver's proposed order.

The proposed order shall be modified to identify what money is to be paid to the Clerk of Court for purposes of restitution to victims and what may be withheld for taxes, in accordance with my prior rulings, and shall provide for releases to that extent only. Silver's counsel shall provide a copy of the proposed order to the Government for the Assistant U.S. Attorney's review.

/s/ Alvin K. Hellerstein, U.S.D.J.
12/29/2024

Respectfully Submitted,



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